

**MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY
and
CITY OF EVANSVILLE
ENVIRONMENTAL PROTECTION AGENCY
Certificate of Operation**

**Berry Plastics
101 Oakley Street
Evansville, Indiana 47710**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above-mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 163-12743-00106	
Issued by: Cheri D. Serra City of Evansville, EPA	Issuance Date:

TABLE OF CONTENTS

A SOURCE SUMMARY

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary
- A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

B GENERAL CONDITIONS

- B.1 Permit No Defense [IC 13]
- B.2 Definitions
- B.3 Permit Term [326 IAC 2-6.1-7(a)]
- B.4 Modification to Permit [326 IAC 2]

C SOURCE OPERATION CONDITIONS

- C.1 PSD Minor Source Status [326 IAC 2-2]
- C.2 Preventive Maintenance Plan [326 IAC 1-6-3]
- C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]
- C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- C.6 Permit Revocation [326 IAC 2-1-9]
- C.7 Opacity [326 IAC 5-1]
- C.8 Fugitive Dust Emissions [326 IAC 6-4]
- C.9 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]
- C.10 Compliance Monitoring [326 IAC 2-1.1-11]
- C.11 Monitoring Methods [326 IAC 3]
- C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]
- C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

Record Keeping and Reporting Requirements

- C.14 Malfunctions Report [326 IAC 1-6-2]
- C.15 Annual Emission Statement [326 IAC 2-6]
- C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3]
- C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]
- C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]
- C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

D.1 FACILITY OPERATION CONDITIONS -Silk Screening & UV printing operations

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

- D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]
- D.1.2 Preventative Maintenance Plan [1-6-3]

Compliance Determination Requirements [326 IAC 2-1.1-11]

- D.1.3 Testing Requirements [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-6.1-5(a)(2)]

- D.1.4 Monitoring

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

Berry Plastics Corporation
Evansville, Indiana
Permit Reviewer: Serra

3 of 23
MSOP 163-12743-00106

Operating Permit Certification Form

Annual Notification

Malfunction Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the Evansville Environmental Protection Agency (EEPA). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
The Permittee owns and operates an injection molded plastic packaging source.

Authorized Individual: Fred Heseman
Source Address: 101 Oakley Street, Evansville, Indiana 47710
Mailing Address: P.O. Box 959, Evansville, IN 47708
Phone Number: (812) 424-2904
SIC Code: 3089
County Location: Vanderburgh
County Status: Maintenance for ozone
Attainment for all other criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD or Emission Offset Rules;
Minor Source, Section 112 of the Clean Air Act

- A.2 Emissions units and Pollution Control Equipment Summary
This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Nine (9) silkscreen machines, which have no air pollution control devices, and vent thru an exhaust stack to the outside air. Each silkscreen machine has it s own natural gas burner for process heat.
- (b) Sixteen (16) ultraviolet cure ink printers, which have no air pollution control devices. Nine (9) of which vent through an exhaust stack to the outside air, seven (7) do not vent to an exhaust stack. Each ultraviolet cure ink printer has it s own natural gas burner for process heat.
- (c) Two (2) heated thermal decorators, HTD1 and HTD2. HTD1 has a .294 mm btu/hr natural gas burner; HTD2 has a .504 mm btu/hr natural gas burner. Neither thermal decorator exhausts to a stack.
- (d) Fifteen (15) solvent parts washers. Four (4) of which vent through an exhaust stack to the outside air, the other eleven (11) do not vent to an exhaust stack.
- (e) One (1) 500 gallon above ground storage tank for used hydraulic oil.
- (f) One (1) 550 gallon above ground storage tank for virgin solvent.
- (g) Fifty-two (52) injection-molding machines, which have no air pollution control devices and do not vent to an exhaust stack.

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a minor source, as defined in 326 IAC 2-7-1(22),
- (b) It is not an affected source under Title IV (Acid Deposition Control) of the Clean Air Act, as defined in 326 IAC 2-7-1(3),
- (c) It is not a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONSTRUCTION CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

- B.1 Permit No Defense [IC 13]
This permit does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state and federal requirements.
- B.2 Definitions
Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.
- B.3 Permit Term [326 IAC 2-6.1-7(a)]
This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the permit term.
- B.4 Modification to Permit [326 IAC 2]
Notwithstanding the Section B condition entitled Minor Source Operating Permit , all requirements and conditions of this permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

- (a) The total source potential to emit of any of the criteria pollutants is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.

C.2 Preventive Maintenance Plan [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP s shall be submitted to IDEM, OAQ and EEPa upon request and shall be subject to review and approval by IDEM, OAQ and EEPa. IDEM, OAQ and EEPa may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Evansville EPA
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Blvd.
Evansville, Indiana 47708

and

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the authorized individual as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the EEPA and OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, Evansville EPA, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify EEPA and IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

- (b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) Evansville EPA, in conjunction with IDEM, OAQ shall issue a revised permit.

The notification, which shall be submitted by the Permittee, does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause, which establishes in the judgment of EEPA and IDEM, OAQ the fact that continuance of this permit, is not consistent with purposes of this article.

C.7 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.8 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

Testing Requirements

C.9 Performance Testing [326 IAC 3-6] [326 IAC 2-1.1-11]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved

by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

Evansville EPA
Room 250
101 N.W. Martin Luther King, Jr. Blvd.
Evansville, IN 47708

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above addresses so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by EEPA and IDEM, OAQ within forty-five (45) days after the completion of the testing. The EEPA or IDEM, OAQ if the source submits to EEPA and IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period, may grant an extension.

The documentation submitted by the Permittee does not require certification by the authorized individual as defined by 326 IAC 2-1.1-1.

Compliance Monitoring Requirements

- C.10 Compliance Monitoring [326 IAC 2-1.1-11]
Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.
- C.11 Monitoring Methods [326 IAC 3]
Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.
- C.12 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 1-6]
(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
- (1) This condition;
 - (2) The Compliance Determination Requirements in Section D of this permit;
 - (3) The Compliance Monitoring Requirements in Section D of this permit;

- (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) in Section D of this permit; and
- (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP s shall be submitted to IDEM, OAQ and Evansville EPA upon request and shall be subject to review and approval by IDEM, OAQ and Evansville EPA. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
 - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
 - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
 - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, had previously submitted a request for an administrative amendment to the permit, and such request has been denied; or
 - (3) An automatic measurement was taken when the process was not operating; or
 - (4) The process has already returned to operating within normal parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.

C.13 Actions Related to Noncompliance Demonstrated by a Stack Test

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ and Evansville EPA, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected emissions unit while the corrective actions are

being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ and Evansville EPA within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ and Evansville EPA that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ and Evansville EPA may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected emissions unit.

The documents submitted pursuant to this condition do not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.14 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Evansville Environmental Protection Agency (EEPA) and the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to EEPA and IDEM, OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.15 Annual Emission Statement [326 IAC 2-6]

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
 - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
 - (2) Indicate actual emissions of other regulated pollutants from the source, for

purposes of Part 70 fee assessment.

- (b) The annual emission statement covers the twelve (12) consecutive month period starting December 1 and ending November 30. The annual emission statement must be submitted to:

City of Evansville, EPA
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Blvd.
Evansville, IN 47708

And

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue,
PO Box 6015
Indianapolis, IN 46206-6015

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by Evansville EPA and IDEM, OAQ on or before the date it is due.

The submittal by the Permittee does require the certification by the authorized individual as defined by 326 IAC 2-1.1-1.

C.16 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered

a valid reason for failure to perform the requirements stated in (a) above.

C.17 General Record Keeping Requirements [326 IAC 2-6.1-2]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an Evansville EPA or IDEM representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or Evansville EPA makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or Evansville EPA within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
 - (1) The date, place, and time of sampling or measurements;
 - (2) The dates analyses were performed;
 - (3) The company or entity performing the analyses;
 - (4) The analytic techniques or methods used;
 - (5) The results of such analyses; and
 - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
 - (1) Copies of all reports required by this permit;
 - (2) All original strip chart recordings for continuous monitoring instrumentation;
 - (3) All calibration and maintenance records;
 - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

C.18 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The

Compliance Monitoring Report shall include the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Evansville Environmental Protection Agency
Room 250, Federal Building
101 N.W. Martin Luther King, Jr. Blvd.
Evansville, Indiana 47708

and

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by Evansville EPA and IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the authorized individual as defined by 326 IAC 2-1.1-1(1).
- (e) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) A malfunction as described in 326 IAC 1-6-2; or
 - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
 - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit

and ending on the last day of the reporting period.

C.19 Annual Notification [326 IAC 2-6.1-5(a)(5)]

- (a) Annual notification shall be submitted to the Evansville EPA and Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. An authorized individual must sign the notification.
- (c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Evansville EPA
Room 250, Federal Building
101 NW Martin Luther King, Jr. Blvd.
Evansville, Indiana 47708

and

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015
- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by Evansville EPA and IDEM, OAQ, on or before the date it is due.

SECTION D.1 FACILITY OPERATION CONDITIONS

Emissions Units Description:

The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.

One (1) injection molded plastic packaging plant consisting of:

- (a) Nine (9) silkscreen machines, which have no air pollution control devices and vent through a stack to the outside air. Each silkscreen machine has its own natural gas burner for process heat
- (b) Sixteen (16) ultraviolet cure ink printers, which have no air pollution control devices. Nine (9) of which vent through a stack to the outside air, seven (7) do not vent to an exhaust stack. Each ultraviolet cure ink printer has its own natural gas burner for process heat.
- (c) Two (2) heated thermal decorators, HTD1 and HTD2. HTD1 has a .294 mm btu/hr natural gas burner; HTD2 has a .504 mm btu/hr natural gas burner. Neither thermal decorator exhausts to a stack.

Fifteen (15) solvent parts washers. Four (4) of which vent to an exhaust stack. The other eleven (11) do not vent to a stack.

One (1) 500 gallon above ground storage tank for used hydraulic oil

One (1) 550 gallon above ground storage tank for virgin solvent.

Fifty-two (52) injection-molding machines, which have no air pollution control devices and do not vent to an exhaust stack.

Emission Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission limitations) particulate matter emissions shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

D.1.2 Preventative Maintenance Plan [326 IAC 1-6-3]

A Preventative Maintenance Plan is not required for this facility.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.3 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test the emissions units by this permit. However, Evansville EPA and/or IDEM may require compliance testing when necessary to determine if the emissions units are in compliance. If Evansville EPA or IDEM requires testing, compliance with the Particulate Matter (PM) limited specified in Condition D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirement [326 IAC 2-6.1-5(a)(2)]

D.1.4 Monitoring

This permit does not specifically require monitoring of these facilities. However, any change or modification may require these facilities to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-6.1-5(a)(2)]

There are no specific record keeping or reporting requirements for this facility.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT, OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**and
City of Evansville Environmental Protection Agency**

**MINOR SOURCE OPERATING PERMIT
CERTIFICATION**

Source Name: Berry Plastics Corporation
Source Address: 101 Oakley Street, Evansville, IN 47710
Mailing Address: P.O. Box 959, Evansville, IN 47708-0959
MSOP Permit No: 163-12743-00106

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT, OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**and
City of Evansville Environmental Protection Agency**

**MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under
326 IAC 2-6.1-5(a)(5).

Company Name:	Berry Plastics Corporation
Address:	101 Oakley St.
City:	Evansville
Phone #:	(812) 424-2904
MSOP #:	163-12743-00106

I hereby certify that Berry Plastics Corp is ☒ still in operation.

☐ no longer in operation.

I hereby certify that Berry Plastics Corp is

☒ in compliance with the requirements of MSOP 163-12743-00106

☐ not in compliance with the requirements of MSOP 163-12743-00106

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

**EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY
FAX NUMBER 812-435-6155**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ? ____, 25 TONS/YEAR SULFUR DIOXIDE ? ____, 25 TONS/YEAR NITROGEN OXIDES ? ____, 25 TONS/YEAR VOC ? ____, 25 TONS/YEAR HYDROGEN SULFIDE ? ____, 25 TONS/YEAR TOTAL REDUCED SULFUR ? ____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ? ____, 25 TONS/YEAR FLUORIDES ? ____, 100 TONS/YEAR CARBON MONOXIDE ? ____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ? ____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ? ____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ? ____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ? ____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF MALFUNCTION AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: _____ PHONE NO. () _____
LOCATION: (CITY AND COUNTY) _____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP: _____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: _____

DATE/TIME MALFUNCTION STARTED: ____/____/20____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE ____/____/20____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO₂, VOC, OTHER: _____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS: _____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES: _____

CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: _____

CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: _____

INTERIM CONTROL MEASURES: (IF APPLICABLE) _____

MALFUNCTION REPORTED BY: _____ TITLE: _____

(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: _____ DATE: _____ TIME: _____

*SEE PAGE 2

Page 1 of 2

**Please note - This form should only be used to report malfunctions
applicable to Rule 326 IAC 1-6 and to qualify for
the exemption under 326 IAC 1-6-4.**

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 Malfunction definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

Berry Plastics Corporation
Evansville, Indiana
Permit Reviewer: Serra

23 of 23
MSOP 163-12743-00106

**Indiana Department of Environmental Management
Office of Air Quality and
City of Evansville Environmental Protection Agency**

**Technical Support Document (TSD) for a
Minor Source Operating Permit**

Source Background and Description

Source Name: Berry Plastics Corporation
Source Location: 101 Oakley Street, Evansville, IN 47710
County: Vanderburgh
SIC Code: 3089
Operation Permit No.: 163-12743-00106
Permit Reviewer: Serra

The Office of Air Quality (OAQ) and City of Evansville EPA (EEPA) have reviewed an application from Berry Plastics Corporation relating to the operation of an injected molded plastic packaging operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Nine (9) silkscreen machines, which have no air pollution control devices, and vent through an exhaust stack to the outside air. Each silkscreen machine has it's own natural gas burner for process heat.
- (b) Sixteen (16) ultraviolet cure ink printers, which have no air pollution control devices. Nine (9) of which vent through an exhaust stack to the outside air, seven (7) do not vent to an exhaust stack. Each ultraviolet cure ink printer has it's own natural gas burner for process heat.
- (c) Two (2) heated thermal decorators, HTD1 and HTD2. HTD1 has a .294 mm btu/hr natural gas burner; HTD2 has a .504 mm btu/hr natural gas burner. Neither thermal decorator exhausts to an exhaust stack.
- (d) Fifteen (15) solvent parts washers. Four (4) of which vent through an exhaust stack to the outside air, the other eleven (11) do not vent to an exhaust stack.
- (e) One (1) 500 gallon above ground storage tank for used hydraulic oil.
- (f) One (1) 550 gallon above ground storage tank for virgin solvent.
- (g) Fifty two (52) injection-molding machines, which have no air pollution control devices and do not vent to an exhaust stack.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment

There are no new emission units or new pollution control equipment.

Existing Approvals

The source has been operating under previous approvals, including, but not limited to, the following: **City of Evansville, Certificate of Operation #0525**

- (a) Evansville EPA Operating Permit 0525, issued on March 5, 1995.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
TP01	UV printer	37.0	1.0	300 cfm	130 F
TP02-05, 08,13	UV printers	28.5	1.9	500	130 F
TP06	UV printer	28.5	0.7	500	130 F
TP07	UV printer	32.0	0.7	500	130 F
CP04-SS08	Silkscreen printer	23.5	1.9	5900	130 F
SS09-SS14	Silkscreen printer	23.5	1.9	500	130 F
Solvent tank	Solvent wash tanks	24.0	0.8	200	Ambient
Fork truck	Fork truck repair exhaust	22.5	0.4	200	Ambient
Screen making	Screen making exhaust hood	28.5	0.7	200	Ambient
Cutoff saw	Cutoff saw exhaust hood	23.0	1.7	200	Ambient

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 15, 2000.

Emission Calculations

Appendix A is attached showing the emission calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.

Pollutant	Potential To Emit (tons/year)
PM	3.4
PM-10	3.4
SO ₂	0.007
VOC	42.21
CO	0.923
NO _x	1.1

HAPs	Potential To Emit (tons/year)
Nickel Compounds	Less than 10
Chromium Compounds	Less than 10
TOTAL	Less than 25

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (2) The potential to emit of VOC is greater than 25 tons per year. Therefore, the source is subject to the provisions of 2-6.1.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1997 emission statement.

Pollutant	Actual Emissions (tons/year)
PM	0
PM10	0
SO2	0
VOC	27
CO	0
NOx	0
HAP	0

Potential to Emit of the Source

The table below summarizes the total potential to emit.

	Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Total Emissions	3.4	3.4	0.007	42.21	0.92	1.1	< 25.0

County Attainment Status

The source is located in Vanderburgh County.

Pollutant	Status
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO_x) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Vanderburgh County has been designated as maintenance for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	3.4
PM10	3.4
SO ₂	0.006
VOC	42.21
CO	0.92
NO _x	1.1
Single HAPs	< 10.0 each HAP
Combination HAPs	< 25.0

- (a) This source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first IDEM, OAM air approval issued to this source. (They have a local Evansville EPA permit.)

Federal Rule Applicability

- (a) This source has existed prior to July 23, 1984, therefore no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) are applicable. The tanks were installed in 1989; therefore, Subpart K and Ka do not apply. Subpart Kb does not apply because the tanks are under 40m³.
- (b) This source is not subject to 40 CFR Part 60, Subpart QQ – Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing; because the source has ultraviolet cure printers.
- (c) This source is not subject to NESHAP Subpart T (40 CFR Part 63) because they do not use any of the solvents listed in Subpart T. This source is not a major source of Hazardous Air Pollutants, as defined in 40 CFR 63.2; therefore, Subpart KK (40 CFR Part 63) does not apply.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in Vanderburgh County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2 (8) (Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

326 IAC 6-1 (Particulate Matter)

Vanderburgh County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-16 and neither have the potential to emit one hundred (100 tons per year of PM or actuals of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

Surface coating meets the definition of process operation. Therefore, 326 IAC 6-3-1 is applicable and the PM emissions are regulated under 326 IAC 6-3-2(c).

326 IAC 6-3-2 (Particulate Matter (PM))

Pursuant to 326 IAC 6-3-2, the PM from the coating operations shall not exceed the pound per hour emission rate established as E in the following formula:
Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

326 IAC 8-1-6 (New facilities; general reduction requirements)

This rule does not apply because this facility was in existence before January 1, 1980.

326 IAC 8-2-5 (Paper Coating Operations)

This rule does not apply because there is not 100% saturation of the substrate.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

The solvent parts washers are not subject to this rule because the source is not located in one of the counties listed and the facility was in existence before January 1, 1980.

326 IAC 8-5-5 (Graphic Arts Operations)

This section does not apply because the total potential to emit for this source is less than 100 tons per year of volatile organic compounds.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule does not apply because the source has a PTE less than 100 tons per year of VOC.

Conclusion

The operation of this injection-molded plastic packaging plant shall be subject to the conditions of the attached proposed Minor Source Operating Permit 163-12743-00106.

EVANSVILLE ENVIRONMENTAL PROTECTION AGENCY

Emissions calculation

SUMMARY

Company Name:

Address:

EIS Plant #

EIS Point #

Berry Plastics Corp

101 Oakley St.

106

Page#

Date:

Data Year:

Initials:

17

10-26-00

CDS

Contact Person:

Phone#:

Fred Heseman

812-424-2904

=====

INDIANA POTENTIAL

= MDR x Factor x 8760 hrs / 2000 lbs

=====

CO =

NOx=

PM10 =

SO2=

VOC=

|

0.9198

1.095

3.39954

0.00657

34.58777

T/Y

T/Y

T/Y

T/Y

T/Y

=====

FEDERAL POTENTIAL

=MDR X Factor X 8760hr/2000lbs X Control Factor

=====

CO =

NOx=

PM10 =

SO2=

VOC=

|

0.9198

1.095

3.39954

0.00657

34.58777

T/Y

T/Y

T/Y

T/Y

T/Y

=====

ACTUAL

= Actual usage X Factor/2000lbs X Control Factor

=====

CO =

NOx=

PM10 =

SO2=

VOC=

|

0

0

0

0

0

T/Y

T/Y

T/Y

T/Y

T/Y

=====

POTENTIAL

= Same as actuals without control factor.

=====

CO =

NOx=

PM10 =

SO2=

VOC=

|

0

0

0

0

0

T/Y

T/Y

T/Y

T/Y

T/Y

::